



April 6, 2022

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Re: MB Docket Nos. 20-401, 18-349, 17-105, 16-142 and 98-204; RM-11854

Dear Ms. Dortch:

On Monday, April 4, 2022, National Association of Broadcasters CEO Curtis LeGeyt and the undersigned met with Chairwoman Rosenworcel, Kate Black, the Chairwoman's Chief Policy Advisor, and Holly Sauer, the Chairwoman's Acting Legal Advisor and Chief of the Media Bureau. On Wednesday, April 6, 2022, the same NAB representatives met with Commissioner Starks and his Legal Advisor, Austin Bonner. At the meetings, NAB shared its thoughts regarding the above-referenced proceedings.

At the outset, NAB urged the Commission to more vocally support the broadcast television industry's efforts to transition successfully to ATSC 3.0. We noted the Commission's effective efforts in promoting 5G and broadband generally, and suggested the FCC also highlight and foster the broadcast television industry's laudable innovation efforts. In addition, the Commission should move expeditiously to conclude its ATSC 3.0 multicast rulemaking, which will enable broadcasters to deliver even more free services to the public while undergoing the incredibly complex transition to a new standard.

NAB also urged the Commission to move on from its rulemaking concerning GeoBroadcast Solutions' (GBS') efforts to green light the use of its proprietary technology. All segments of the radio industry have voiced strong objections to the FCC adopting GBS's proposal. Nearly every substantive comment in the record (and those not in some form or fashion affiliated with GBS) have panned the idea. As broadcasters have explained, the only beneficiary of approving this proposal is the company whose technology is at issue. The broadcast advertising market would be harmed and, perversely, the technology would enable (if not encourage) advertisers to redline traditionally underserved communities off the advertising map.

During our conversation with the Chairwoman, NAB also registered its opinion that it is past time to conclude the 2018 quadrennial review of the broadcast television and radio ownership rules. NAB understands that some delay may have been prudent as a result of the Supreme Court granting cert and hearing the case, but now that the decision is far back in the rearview mirror, the Commission must move forward. NAB understands the potential

1 M Street SE
Washington DC 20003 3512
Phone 202 429 5300
nab.org

challenges of completing the review without a full complement of commissioners, and urges the Commission to complete the rulemaking as soon as possible after a full Commission is seated or even sooner if that process does not conclude in the near term.

Finally, NAB addressed the ongoing proceeding concerning Form 395-B during our meeting with Commissioner Starks. NAB reiterated that it does not oppose the Commission moving forward with collecting employment data. NAB recommended, however, that before reinstating the data collection, the FCC should have a well-defined plan for analyzing the data so the process is not in vain. For example, the FCC should determine what metrics it would use to assess industrywide trends and how it would control for issues such as market size, market racial composition, station format, and size of the station groups being analyzed. To produce any meaningful insights, the Commission will have to spend time and resources thinking through these very important issues. NAB also affirmed that our industry is working hard to attract and retain a diverse workforce and we recognize that goal has major benefits for both social and business goals.

Please do not hesitate to contact us with any questions.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Rick Kaplan", with a long horizontal line extending to the right.

Rick Kaplan
Chief Legal Officer and Executive Vice President
Legal and Regulatory Affairs
National Association of Broadcasters